<u>REMARKS</u>

In the above-identified Office action the claims were rejected as being obvious in view of a hypothetical combination of the cited Osa patent and the Sindhu published patent application. In response, all of the original claims have now been cancelled and have been replaced by a new set of claims, Claims 36-42. In this regard, the new claims are believed to be patentably distinct over the cited references for the reasons given below.

As for the form of the new claims, independent Claim 36 constitutes an apparatus similar to that originally set forth in now-cancelled Claim 30, while independent Claim 39 is directed to a method similar to that set forth in now-cancelled Claim 1. For example, the difference between cancelled Claim 30 and new Claim 36 is set forth primarily in the generating means and in the new requirement for a selecting means. This same comparison exists between cancelled Claim 1 and new independent Claim 39.

In particular, a principal feature of the claimed invention is to select a pixel used to substitute a value of the input pixel using a generated random number from extracted pixels in a window which corresponds to a position of an input pixel and has a predetermined size. This feature is supported by the fourth embodiment, represented by Fig. 10, in the Specification. According to the claimed invention, since a pixel in a window is randomly selected as substitute data, low frequency noise is modulated to the high frequency side by the generated random number, and it is possible to obtain a high noise removal effect due to the MTF of a display system or visual sense.

Referring now to the cited references, the cited Osa patent discloses removing block deformation by detecting block deformation from the maximum differential absolute value between vicinity pixels of block boundaries, determining a position where the maximum differential absolute value is obtained as the block boundaries when the block deformation is detected, and adding and subtracting the differential value to and from the vicinity pixels. Furthermore, the Osa reference discloses selecting a pattern that adds and subtracts the differential value based on a random number.

In Osa, however, there is no mention of the above-characterized feature of the claimed invention. Also, the object of Osa is different from the object of the present invention, which is to remove low-frequency noise such as speckle noise or the like. In summary, Osa does not teach or suggest the effects of the present invention.

Similarly, in the cited Sindhu reference there is no mention of the feature of the claimed invention.

Accordingly, Applicant's believe that the claimed invention is allowable over the cited prior art, wherefore the issuance of a Notice of Allowance is solicited.

The Commissioner is hereby authorized to charge fees or credit overpayment to Deposit Account No. 50-3939.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

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